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March 13, 2019

VIA ECF & EMAIL

Honorable Christine M. Gravelle, U.S.B.J.
U.S. Bankruptcy Court
Clarkson S. Fisher Courthouse
402 E. State Street
Trenton, New Jersey 08608

Re: Bommen vs. Bongiorno
Adv. Pro. No.: 18-1586 (CMG)

Dear Judge Gravelle:

My firm represents the plaintiff in this adversary proceeding. As a follow-up to my voicemail this morning with Your Honor's Chambers, I write to respectfully request an extension of today's deadline to submit a default judgment application, as is set forth in Your Honor's Order [ECF #10]. Said Order further indicates that the case will be dismissed unless a default judgment application is filed by today's deadline.

Several weeks ago Debtor's counsel and I discussed the concept of entering into a consent judgment to resolve the entire case. I have recommended the proposed settlement to my client, an elderly widow who is unfamiliar with legal procedures and does not use email to communicate. When I telephoned my client to inform her of this development she was unable to comprehend the proposed settlement. She indicated a preference to meet at my office to discuss the case, but told me that she had contractors at her home repairing a leak and was about to leave the next day for an extended trip overseas.

My client has returned from her trip, and I am expecting to meet with her very shortly to discuss the proposed settlement and to reiterate my recommendation that she accept it.

In view of the foregoing, I kindly ask that Your Honor extend today's default judgment filing date without the necessity of my client incurring the expense of filing a formal motion.

As always, the Court's assistance is greatly appreciated.

Respectfully,

/s/ Glenn R. Reiser

Cc: Adam Schneider, Esq. (via ECF & Email)